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March 28, 2008

VIA FASCIMILE: 212-805-7920

The Honorable Shira A. Scheindlin United States District Court Southern District of New York 500 Pearl Street, Room 1620 New York, New York 10007

> Re: Maldonado et al. v. Zenlighten LLC d.b.a Gobo et al. Docket No.: 07-CV-10462 (SAS)(THK)

CHAMBERS OF MAR 2 8 2008 DOC #: DATE FILE

Dear Judge Scheindlin:

We, along with the Urban Justice Center, represent the Plaintiffs in the above-referenced case. We are writing to request a brief extension of the parties' impending discovery deadlines.

Both parties have served their first sets of interrogatories and document requests. Defendants' responses are due March 31 and Plaintiffs' responses are due April 2. In addition, Plaintiffs are scheduled to provide names of their experts by April 3. The parties have discussed extending these deadlines but could not agree on a new deadline. We propose April 15.

The parties are in the process of discussing the potential settlement of this case. Three days ago, we met for a second settlement conference before Magistrate Judge Katz, who agreed to continue facilitating settlement discussions into next week. Extending discovery deadlines by approximately two weeks would allow us to pursue these discussions without unnecessarily delaying litigation. While both parties agree to some extension of time, Defendants oppose our proposed deadline of April 15 in favor of an excessive 45-day extension that would require revising other dates in the Scheduling Order.

The proposed order accompanying this letter reflects all dates in the original Scheduling Order dated Invery 9, 2008, with the exception of the date for providing names of experts provided in paragraph (3)(c). We respectfully request that the Court grant parties ample time to continue settlement discussions without otherwise disturbing the course of litigation outlined in the Scheduling Order. No prior requests for discovery extensions have been made in this case.

The parties must respond to the first sets of interrogatories and document regress by April 30, 2008. Plaintiff will provide names of their expers by April 30, 2008. This does not affect any other dates cc! 1 Donia Sawwan, Esq., Eli Freedberg, Esq., Carolyn Richmond, Esq. (via facsimile: 212-692-0940)

Respectfully submitted.

March 31

Anjali Bhargava, Legal Intern Amanda Klasing, Legal Intern

Haeyoung Yoon, Esq. (HY 8962)

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